Appendix 8-B

2011 Prioritization Comments & Concerns Memorandum

This appendix includes a technical memorandum prepared by the Consultant Team as part of the 2021 Prioritization submittal from the ETRWPG to the TWDB. The memorandum was prepared after Prioritization of 2021 water management strategies (WMSs).

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MEMORANDUM

East Texas Regional Water Planning Area
Prioritization of Projects in the 2011 Regional Water Plan
Regional Water Planning Group Comments & Concerns

Project No: 1600-002-01

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Prepared For: East Texas Regional Water Planning Group

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The 83rd Texas Legislature, through House Bill 4 (2013), requires each of the 16 Regional Water Planning Groups (RWPG) to prioritize the recommended water management strategies (WMS) in each region's 2011 Regional Water Plan (2011 Plan). Each group provided recommended WMSs to the Texas Water Development Board (TWDB) through the 2012 state water plan database (DB12). To facilitate this task, the TWDB formed a HB4 Stakeholder Committee (SHC) comprised of the 16 RWPG Chairs; the SHC developed Uniform Standards to be used by each RWPG to prioritize projects. These Uniform Standards were adopted by the SHC November 14, 2013 and approved by the governing Board of TWDB December 5, 2013.

In a transmittal dated January 6, 2014, the TWDB provided an alphabetized region-sponsor-strategy prioritization template of projects that each region is responsible for prioritizing. The template includes scoring methodologies, scales, and weighting factors for each uniform standard as developed by the SHC.

This memorandum transmits comments and concerns of the East Texas Regional Water Planning Group (ETRWPG) regarding the prioritization process and Uniform Standards provided by the TWDB. The following comments and concerns were initially developed at the ETRWPG Technical Committee meeting held March 25, 2014, and have been adjusted as a result of further discussion in the ETRWPG meeting held May 21, 2014.

Prioritized Projects Using Information Available in 2011

The transmittal provided from the TWDB did not specify the information to be used in applying each uniform standard.

- Each uniform standard was applied according to information available at the time the 2011 Plan was adopted rather than considering the current status of each project.

- The information used was a compilation of data available in the 2011 Plan and the consultant's knowledge of each project at that time. Project updates were not solicited from Wholesale Water Providers (WWP) or Water User Groups (WUG) as a part of the prioritization process developed.

Further Descriptions Needed for Projects

The information in the DB12 has been found to be inaccurate or unclear in some cases, but this information drives much of the scoring in prioritization.

- Care should be taken in development of the DB17 to provide more clarity, resolve problems, and minimize risk of inappropriate scoring.
- There is concern on how the public will react to the prioritization rankings, and the ETRWPG believes adding commentary to the scoring template to provide more details for each project could help.
- All of the projects provided in the template from the TWDB were prioritized regardless of whether or not the project will seek state funding, is no longer being considered by the sponsor, or has already been completed.

Current Uniform Standards Result in Numerous Ties

The scoring criteria for the uniform standards do not allow enough variability to minimize ties in final scores at the regional level.

- Approximately 40% of the ETRWPG 2011 projects result in a prioritization final score equal to the final score of at least one other project.
- The ETRWPG is concerned with final score ties at both the regional and state level in regards to how the TWDB will allocate funds.
- One potential way of resolving ties could be to allow regions to add their own unique scoring criteria that would be used specifically for the purpose of breaking such ties. Would regions be allowed to develop and use additional criteria?

Uniform Standard 2A

This uniform standard reads as follows:
What supporting data is available to show that the quantity of water needed is available? [Models suggest insufficient quantities of water or no modeling performed = 0 points; models suggest sufficient quantity of water = 3; Field tests and measurements confirm sufficient quantities of water = 5]

- The scoring criteria do not allow a surface water source to receive the maximum score for this standard because field tests and measurements are not used to confirm sufficient quantities of surface water.

- The Technical Committee would like the SHC to consider revising Uniform Standard 2A to enable a new surface water source to receive a 5 for this standard if models suggest a sufficient quantity of water.

Uniform Standard 3C

This uniform standard reads as follows:
Is this project the only economically feasible source of new supply for the WUG, other than conservation? [No = 0 points; Yes = 5]

- An advantage is given to sponsors with only one recommended WMS, and there is a disadvantage to sponsors with several recommended WMSs, even if one of these projects is the most economically feasible source of new supply.

Uniform Standard 3D

This uniform standard reads as follows:
Does this project serve multiple WUGs? [No = 0 points; Yes = 5]

- The scoring criteria do not account for how many WUGs a recommended WMS serves. A more detailed scoring breakdown to distinguish between two WUGs served and numbers of WUGs greater than two would be helpful.

Projects Shared across Regions

Several strategies either provide water to or receive water from a strategy in another region. These projects have a cost that is either shared with or borne by one region or the other.

- The current prioritization instructions do not indicate if any of the Uniform Standards need to be evaluated differently for these types of projects.
- The TWDB has not disclosed to the regions how projects serving more than one region will be integrated into one list.

Water Type and Water Use Category

The Uniform Standards do not differentiate between raw water and treated water strategies or water use categories (Municipal, Manufacturing, Livestock, etc.).

- It is not appropriate to compare strategies with different water types or different water use categories against one another because certain uniform standards may benefit one water type or use over another. For example, raw water strategies tend to be less expensive than treated water strategies.

Agriculture / Conservation Projects

The prioritization template has the yellow "Rural / Agricultural Conservation?" and "Conservation Reuse?" columns protected and are therefore read-only even though the "read me" sheet indicates the RWPG should input data into yellow cells.

- The ETRWPG decided to leave these columns blank as the TWDB did not advise the group on how to mark the agriculture and conservation columns in the scoring sheet for the 2011 Prioritization.

Project Roll-Ups

The TWDB has given RWPGs the option to roll up projects that are linked via a funding relationship.

- The ETRWPG believes that the concept of scoring using rolled up projects is valid and helpful to WUGs. However, there is a concern that the definition of what constitutes a roll-up is not clear, making it difficult to identify some projects that may otherwise be eligible for scoring as a roll-up. Additional clarification should be considered.